

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division**

**INNOVATIVE SPORTS MANAGEMENT, INC.)
d/b/a INTEGRATED SPORTS MEDIA, INC.,)**

Plaintiff,)

v.)

Case No. 2012-cv-7908

**MARIA PLESZKA, indiv. and d/b/a CAFÉ)
TWO07, LTD. d/b/a CAFÉ TWO 07 and)
CAFÉ TWO07, LTD. d/b/a CAFÉ TWO 07)
Defendants.)**

**PLAINTIFF'S MOTION TO REINSTATE AND ENTER AN ORDER OF
JUDGMENT AGAINST THE DEFENDANTS**

NOW COME the Plaintiff, INNOVATIVE SPORTS MANAGEMENT, INC. d/b/a INTEGRATED SPORTS MEDIA, INC., a New Jersey Corporation, by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court Reinstate this matter against Defendants, MARIA PLESZKA, indiv. and d/b/a CAFÉ TWO07, LTD. d/b/a CAFÉ TWO 07 and CAFÉ TWO07, LTD. d/b/a CAFÉ TWO 07, and in support thereof, states as follows:

1. That on February 7, 2013, this matter was dismissed without prejudice by this Honorable Court, with leave to reinstate on or before February 18, 2014.

2. That a Settlement Agreement was entered into by both parties wherein which the Defendant would pay a total of \$5,000.00 to the Plaintiff. A payment of \$500.00 was to be made on February 28, 2013 and payments in the amount of \$500.00 to be paid thereafter on the Thirtieth of each month starting March 30, 2013, 2012 and continuing through November 30, 2013, until the total amount was paid in full. See attached Exhibit A.

3. As of the filing of this Motion, Defendants have failed to comply with the Settlement Agreement and have made no payments towards said Agreement.

5. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$5,000.00 plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00). See attached Affidavit Exhibit B.

6. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See attached Settlement Agreement.

WHEREFORE, Plaintiff, INNOVATIVE SPORTS MANAGEMENT, INC. d/b/a INTEGRATED SPORTS MEDIA, INC., a New Jersey Corporation,, prays this Honorable Court enter an order to Reinstate this case against Defendants, MARIA PLESZKA, indiv. and d/b/a CAFÉ TWO07, LTD. d/b/a CAFÉ TWO 07 and CAFÉ TWO07, LTD. d/b/a CAFÉ TWO 07, and enter an Order for Judgment in the amount of Five Thousand Five Hundred and 00/100 (\$5,000.00) plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Eight Thousand Six Hundred and 00/100 (\$8,600.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu
Andre Ordeanu

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on June 24, 2013, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu
Andre Ordeanu

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